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12 *Attorneys for Plaintiff*
13 TIFFENY NANCE

14 [Additional Counsel Listed on Following Page]

15 **UNITED STATES DISTRICT COURT**
16 **EASTERN DISTRICT OF CALIFORNIA**

17 TIFFENY NANCE, on behalf of herself
18 and the Class Members,

19 Plaintiff,

20 vs.

21 RYDER INTEGRATED LOGISTICS,
22 INC., a Delaware Corporation; and RYDER
23 SYSTEM, INC., a Florida Corporation,

24 Defendants.

25 Case No. 2:23-cv-00477-TLN-JDP

26 [Assigned to the Honorable Troy L.
27 Nunley]

28 **STIPULATION AND ORDER TO
STAY DISCOVERY FOR THIRTY
DAYS**

Complaint Filed: March 13, 2023
Trial Date: None

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7 Attorneys for Defendants
8 RYDER INTEGRATED LOGISTICS, INC.
and RYDER SYSTEM, INC.

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1 Plaintiff Tiffeny Nance (“Plaintiff”) and Defendants Ryder Integrated Logistics, Inc.
2 and Ryder System, Inc. (collectively, “Ryder”) (together the “Parties”), by and through their
3 undersigned counsel, hereby enter into the below stipulation with reference to the following
4 facts:

5 WHEREAS, on March 13, 2023, Plaintiff filed her class-action complaint for
6 damages against Ryder in the United States District Court for the Eastern District of
7 California, captioned *Tiffeny Nance v. Ryder Integrated Logistics, Inc. et al.*, Case No.
8 2:23-cv-00477 (Plaintiff’s “Class Action”);

9 WHEREAS, as relevant here, there are currently two related cases pending
10 against Ryder in the United States District Court for the Northern District of California:
11 *Perkins v. Hadco Santa Fe Springs CA dba Ryder Integrated Logistics, Inc.*, Case No.
12 3:23-cv-00502-WHO & 3:23-cv-01694-WHO (“Perkins”) and *Jose Johnson, et al. v.*
13 *Ryder Transp. Solutions, LLC*, Case No. 4:22-cv- 07456-JST (“Johnson”);

14 WHEREAS, on October 24, 2023, Ryder and the parties in the *Perkins* and
15 *Johnson* actions participated in a successful mediation and agreed to a settlement in
16 principle that, by definition, Ryder states encompasses the putative class and claims
17 alleged in Plaintiff’s Class Action;

18 WHEREAS, the Parties previously stipulated to extend the Phase I Discovery
19 Cutoff deadline by sixty days to March 12, 2024; and

20 WHEREAS, on January 3, 2024, the Parties stipulated to stay discovery in this
21 case by thirty days in exchange for Ryder providing the executed Settlement
22 Agreement to counsel in this case when it is fully executed, to give the Parties time to
23 meet and confer regarding the impact of the *Perkins/Johnson* settlement on this case.

24 WHEREAS, in response to the Parties’ stipulation, on January 3, 2024, the Court
25 signed an order staying discovery for thirty days;

26 WHEREAS, on February 1, 2024, the Parties stipulated to stay discovery for
27 another thirty days and to extend Plaintiff’s deadline to file a motion for class
28 certification by sixty days, as the Perkins/Johnson settlement had not been fully drafted;

1 WHEREAS, in response to the Parties' stipulation, on February 1, 2024, the
2 Court signed an order staying discovery for thirty days and extending the deadline for
3 Plaintiff to file a motion for class certification by thirty days, making the current
4 deadline for Plaintiff to file her motion September 6, 2024;

5 WHEREAS, the *Perkins/Johnson* settlement is still undergoing revision but is
6 near completion;

7 WHEREAS, the Parties seek to stay discovery for another thirty days so that
8 Ryder can provide a copy of the executed Settlement Agreement to counsel when
9 finalized, and so that the Parties can accomplish their original objective of conferring
10 regarding the impact of that settlement on this case;

11 WHEREAS, Plaintiff seeks a commensurate thirty day extension of her deadline
12 to file a motion for class certification, and the Parties have agreed to this.

13 IT IS HEREBY JOINTLY STIPULATED AND AGREED, by and between the
14 Parties through their respective counsel of record that:

15 1. The Parties agree that this Court enter an Order to stay all current and
16 pending discovery in this case for thirty days.

17 2. The Parties agree that this Court enter an Order extending Plaintiff's
18 deadline to file a motion for class certification by thirty days, to October 7, 2024.

19 | IT IS SO STIPULATED.

Dated: February 29, 2024

**SCHNEIDER WALLACE
COTTRELL KONECKY LLP**

By: /s/ Eugene Zinovyev
Carolyn H. Cottrell
Ori Edelstein
Eugene Zinovyev
Attorneys for Plaintiff
TIFFENY NANCE

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2
3 Dated: February 29, 2024

REED SMITH LLP

4
5 By: /s/ Tanner J. Hendershot

6 Mara D. Curtis

7 Rafael N. Tumanyan

Tanner J. Hendershot

8 *Attorneys for Defendants*

9 RYDER INTEGRATED LOGISTICS, INC.

10 and RYDER SYSTEM, INC.

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ORDER

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Pursuant to the above Stipulation, and good cause appearing, **IT IS SO**
ORDERED as follows:

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1. All current and pending discovery in this case is stayed for thirty days.
2. Plaintiff's deadline to file a motion for class certification is extended by thirty days, to October 7, 2024.

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Dated: February 29, 2024

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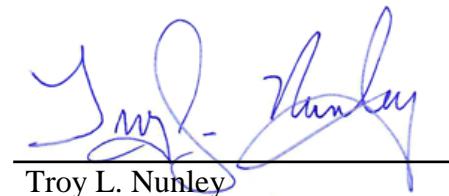
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Troy L. Nunley
United States District Judge